

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

INA STEINER, DAVID STEINER,
and STEINER ASSOCIATES, LLC

Plaintiffs,

v.

EBAY, INC., et al.,

Defendants.

Civil Action No. 1:21-cv-11181-PBS

**DECLARATION OF BRADLEY F. SILVERMAN IN OPPOSITION TO
DEFENDANT WENDY JONES'S MOTION TO STRIKE PLAINTIFFS'
PROFFER OF FUTURE TESTIMONY OR, IN THE ALTERNATIVE,
MOTION FOR SUPPLEMENTAL DISCOVERY**

I, Bradley F. Silverman, hereby declare:

1. I am counsel to Finkelstein, Blankinship, Frei-Pearson & Garber, LLP, attorneys for plaintiffs Ina Steiner, David Steiner, and Steiner Associates LLC in the above-captioned action. I submit this declaration in opposition to the motion of defendant Wendy Jones to strike Plaintiffs' proffer of future testimony or, in the alternative, motion for supplemental discovery. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. Attached hereto as Exhibit 1 is a true and correct copy of Confidential Settlement Agreement and General Release with bates stamps WYMER00000045-WYMER00000064. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief.

This declaration is executed in Irvington, New York on April 24, 2025.

/s/ Bradley F. Silverman
Bradley F. Silverman

CERTIFICATE OF SERVICE

I hereby certify that on April 24, 2025, this document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants.

Date: April 24, 2025

/s/ Bradley F. Silverman

Bradley F. Silverman